

CES Environmental Services, Inc.

Houston, TX - EPA Region VI

POLREP #1

Initial (DRAFT)

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U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
CES Environmental Services, Inc. - Removal Polrep
Initial Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Region VI

Subject: POLREP #1
Initial (DRAFT)
CES Environmental Services, Inc.

Houston, TX

To: Ronald D. Crossland, USEPA Superfund Division - PRB

From: Gary Moore, FOSC

Date: 9/9/2014

Reporting Period:

1. Introduction

1.1 Background

Site Number:	A6JP	Contract Number:	
D.O. Number:		Action Memo Date:	8/26/2014
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	9/3/2014	Start Date:	9/3/2014
Demob Date:		Completion Date:	
CERCLIS ID:	TXD008950461	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time Critical

1.1.2 Site Description

This Site is a former chemical recycling facility that filed for bankruptcy in 2010. The Site is under the control of a Trustee for the Estate appointed by the Bankruptcy Court. The Estate does not have the funding necessary to address the conditions at the site. The site consists of approximately 11 vacuum

boxes, 2 roll-off boxes, 12 frac tanks, 2 Tanker Trailers, 20 Aboveground Storage Tanks (ASTs), 15 Waste Water Treatment Tanks, Waste Piles, and numerous totes, vats, drums, and smaller containers. In addition, spillage of chemicals to exterior surfaces as well as building interiors. The Site has experienced significant vandalism since its bankruptcy in 2010. Additionally, recent spills have occurred due to vandalism which has resulted in the spillage of chemicals and waste to the ground surface and into an adjacent residential neighborhood. Emergency responses to these spills has involved the Estate, City of Houston, Texas Commission on Environmental Quality, and the EPA. These spill responses were addressed by the Estate, Texas Commission on Environmental Quality (TCEQ), and the EPA. .

1.1.2.1 Location

4904 Griggs Road
Houston, Harris County, Texas 77021
Latitude: 29.6984
Longitude: -95.3435

1.1.2.2 Description of Threat

The Site is bordered by residential properties and a charter school. Releases of chemicals from the site have been documented into residential areas south of the site as a result of previous spills. These spills have been cleaned up but residual contamination remains which will need to be further investigated. Additionally, the area is saturated with phenolic odors believed to be associated with several of the vacuum boxes and historic releases from these containers.

The primary threats associated with the site is the potential exposure to the surrounding populations from releases from the containers located on the site. Additionally, stormwater could carry materials spilled or materials already spilled off-site impacting both the residential populations and the environment.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The site is abandoned and has been significantly vandalized since 2010. Roll-off boxes and Tank Trailers have been stolen from the site and chemicals have been deposited in other on-site containers, secondary containment of aboveground storage tanks, and on the ground surfaces. Additionally, containers have deteriorated and continue to deteriorate and have leaked chemicals to the ground surfaces. The site has approximately 11 vacuum boxes, 2 roll-off boxes, 12 frac tanks, 2 Tanker Trailers, 20 Aboveground Storage Tanks (ASTs), 15 Waste Water Treatment Tanks, Waste Piles, and numerous totes, vats, drums, and smaller containers. The site currently floods during rainfall events as on-site storm drains have been plugged. Stormwater from a portion of the site drained into the neighborhood to the south through early August 2014 at which time the City of Houston and the TCEQ blocked drainage (diking) from continuing to drain into the above and below ground drainage system in the neighborhood. Stormwater continues to drain off-site into the storm drain at the northwest side of the facility heavy rains cause the pooled area to reach capacity.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

The EPA has mobilized its ERRS and START Contractors to begin to address the issues associated with the Site. The EPA Team is in the process of conducting site setup activities. Additionally, container sampling and laboratory and field chemistry is being conducted to determine potential bulking and disposal options. Also, the EPA is working with the City of Houston on the potential for discharge of potentially contaminated stormwaters into the sanitary sewer to be treated at the City's Sewer Treatment

Plant. As analytical results are received, disposal options will be determined and disposal of containerized waste will begin.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The EPA and TCEQ are currently reviewing facility documents to identify PRPs. If liable and viable PRPs are identified, the EPA will begin negotiations for a potential takeover of the current response actions.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

The anticipated activities (in no particular order) are:

1. Sampling/Analytical to determine disposal options for On-Site Containers and Contaminated Stormwaters;
2. Determine Bulking, Disposal, and Treatment Options for On-Site Containers and Contaminated Stormwaters;
3. Management of On-Site Stormwater;
3. Conduct Disposal of Wastes and Cleaning and Disposal and Recycling of Containers;
4. Remove/Clean/Dispose of Visible Contamination from Soil, Asphalt, and Concrete;

2.2.1.1 Planned Response Activities

The response activities will involve the disposal of the following containers:

1. Vacuum/Roll-Off Boxes;
2. Management of Stormwaters and Address Building Drainage;
2. Frac Tank Wastes;
3. Totes, Drums, and Smaller Containers;
4. Aboveground Storage Tanks;
5. Contaminated Soils, Asphalt, and Concrete;

2.2.1.2 Next Steps

The next activities will be to begin disposal of vacuum/roll-off boxes and continued management of stormwater.

2.2.2 Issues

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$1,300,000.00	\$0.00	\$1,300,000.00	100.00%
START	\$150,000.00	\$0.00	\$150,000.00	100.00%
Intramural Costs				
Total Site Costs	\$1,450,000.00	\$0.00	\$1,450,000.00	100.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

City of Houston
Texas Commission on Environmental Quality

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.